June 12, 2019

SENT VIA CERTIFIED U.S. MAIL

Mr. Ronald Schuyler
EDIR – VERR Coordinator
Certification and Compliance Division
U.S. Environmental Protection Agency
2000 Traverwood Dr.
Ann Arbor, MI 48105

Dear Mr. Schuyler:

Pursuant to paragraph 85.1903 of Title 40 C.F.R., Mercedes-Benz USA LLC, (MBUSA) on behalf of DaimlerAG (DAG), hereby submits the following Emission Defect Information Report:

EDIR_2010_6_Additive tank SCR_2010-11-09.doc

Should you have any questions or require additional clarification, please do not hesitate to contact Dr. Andreas Roessler of the Ann Arbor Technology Center at 734-995-3066.

Thomas Brunner
Department Manager, Product Compliance, Analysis, Safety & Emissions

Anthony LaSpada
Associate General Counsel & Assistant Secretary

Enclosure

FD: sk

cc: Tom Ball, U.S. EPA

EMISSION DEFECT INFORMATION REPORT
IN ACCORDANCE WITH 40 C.F.R. § 85.1903

EDIR-Reference:	Additive tank SCR
Submission Date:	2010-11-09
Amendment(s):	-

1.0 Manufacturer's Corporate Name

Daimler, AG ("DAG") and Mercedes-Benz USA, LLC ("MBUSA")

2.0 Description of the Defect:

DAG has determined that the plastic material used to cover and protect the SCR/DEF tank heater may, overtime, absorb a small amount of urea from the DEF solution that is sufficient to cause a false short to ground. This false short to ground results in the urea level sensor no longer being monitored by the system. This condition will result in the activation of the malfunction indicator lamp (MIL).

- Part designation: Additive tank compl SCR
- Part number(s): A 164 470 43 01, A 164 470 44 01

3.0 Description of Each Class of Vehicles Potentially Affected

MY	Test Group	MB Vehicle Code	Transm. Config.	Model	50 State Sales
2009	9MBXT03.0U2A	W164DE30TC 4x4	L-7	ML 320 BLUETEC	3,230
		V251DE30TC 4x4	L-7	R 320 BLUETEC	357
	9MBXT03.0U2B	X164DE30TC 4x4	L-7	GL 320 BLUETEC	2,401
2010(*)	AMBXT03.0U2A	W164DE30TC 4x4	L-7	ML 350 BLUETEC	2,250
		V251DE30TC 4x4	L-7	R 350 BLUETEC	264
	AMBXT03.0U2B	X164DE30TC 4x4	L-7	GL 350 BLUETEC	2,748
2011(*)	BMBXV03.0U2B	W212DE30TC	L-7	E 350 BLUETEC	1,833
				TOTAL	**13,083**

*projected sales

4.1 Number of Vehicles Estimated to be Potentially Affected

The above described situation is limited to the production period starting model year 2009 and ending model year 2010 for the SUV's and for the E-Class starting June 2010 and ending October 2010. During this period 13,083 vehicles were manufactured which could be affected by this situation.

4.2 Address of Plants at Which Potentially Affected Vehicles Were Produced

Mercedes-Benz Tuscaloosa, AL, United States
Mercedes-Benz Sindelfingen, Germany

5.0 Emission and Drivability Impact of Affected Vehicles

There is no impact on driveability.

There is no impact on emissions since the SCR/DEF monitoring protocol contains a back-up program to assure driver notification in the case of low urea levels. Although in the case where there is a false short to ground the level sensor will no longer function, the DCU/ECM reverts to an alternative urea level program that uses the last known urea level value prior to the sensor failure and calculates urea consumption based on the actual operation of the urea dosing valve. Accordingly, even if a vehicle's urea level sensor is non-operational, the warning system and vehicle no start program will still be fully functional to assure no operation without DEF.

6.0 Emission data

No emission tests were performed due to no impact on emissions.

7.0 Manufacturer Follow-Up

DAG has developed an update of the software which will remedy the described issue. The urea fuel level sensor and the urea tank temperature sensor are connected with a common ground line. The new short to ground monitoring protocol therefore uses the ground line of the urea fuel tank sensor instead of the urea level sensor ground line to reinstate a fully functional level sensor.

DAG will automatically implement this work free of charge for all affected vehicles at the next scheduled or unscheduled workshop visit.